



State of New Jersey

Christine Todd Whitman
Governor

Department of Environmental Protection

Robert C. Shinn, Jr.
Commissioner

Ms. Carole Petersen, Chief
New Jersey Remediation Branch
USEPA Region 2
290 Broadway
New York, NY 10007-1866

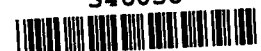
JUN - 2 1999

Dear Ms. Petersen:

Re: L.E. Carpenter Superfund Site
Wharton, Morris County

The New Jersey Department of Environmental Protection (Department) is in receipt of your May 20, 1999 letter regarding the L.E. Carpenter Superfund Site. As you are aware, in December 1997 the PRPs began using Enhanced Fluid Recovery (EFR) which is conducted by applying a vacuum to product recovery wells to primarily remove free standing product in addition to contaminated ground water, and contaminant vapors within vadose zone soils. As of March 24, 1999, 1,933 gallons of free product were removed. The amount of free product removed on a monthly basis has fluctuated over time and has generally decreased. Your letter states that this decrease is "...surprising given the several acre size of the impacted area." In fact, this decrease in recovery should not be surprising since it was stated that this would occur on page 9 of the *Remedial Action Plan for Phase I-Free Product Recovery* dated February 21, 1997. In addition, the removal of only 14 gallons on October 22, 1998 (EFR event # 13) was discussed in the footnotes of the *Quarterly Monitoring Report, Fourth Quarter 1998* and the *Quarterly Monitoring Report, First Quarter 1999*, which state "EFR events 13 and 14 product removal was low due to significant quantities of product remaining emulsified as the result of a short vac truck standing time prior to gauging. Vac truck is now allowed to sit for a minimum of 1 hour prior to gauging on flat ground." As a result, free product recovery has increased, with a high of 74 gallons in February 1999.

The Department is confused by the statement in your letter "[t]he reports fail to estimate the volume of remaining product so it is difficult to assess overall remedial progress, including estimating the period of time it may take to remediate the immiscible product...". The quarterly monitoring reports do not specifically provide this information, however the quantity of product removed on a monthly basis is included, as well as the product thickness in various wells. EPA has not commented on the quarterly reports since the EFR activities began and never requested this information. If EPA did request this information, it would have been provided in the quarterly reports. EPA did, however, comment on the *Remedial Action Plan* in a letter dated May 27, 1997 that the PRP responded to on July 9, 1997. At that time EPA raised the question of the amount of free product present at the site. In response to that concern, the PRP provided free



product volume calculations and it was estimated that the product volume was 29,640 gallons as of August 1995. Of that amount, the estimated recoverable volume ranged from 1,500 to 17,800 gallons, which is based on utilizing the low end (5%) and high end (60%) for product recovery rates. Therefore, the amount of free product recovered as of March 24, 1999 exceeded the estimated minimum recoverable amount by almost twenty-nine percent. Since the predictions of the amount of recoverable free product vary so greatly, it is extremely difficult to accurately predict the amount of time needed for its removal.

Regarding the scheduling of the site visit, Gwen Zervas of my staff was trying to coordinate a site visit with Stephen Cipot and the PRP's consultant. Unfortunately, the consultant did not notify Ms. Zervas when they were recently at the site, and consequently the opportunity for a site visit with the PRP was missed. Ms. Zervas informed Mr. Cipot of this, and Mr. Cipot stated that another time could be arranged with the PRP's consultant in the future and that there was no immediate need for EPA to visit the site. To satisfy EPA's request, a site visit has been set for June 22, 1999, which has been confirmed with Mr. Cipot.

Finally, your letter states that EPA may be able to "...suggest additional remedial actions that will help to expedite the overall site cleanup process, including use of a multiple phase recovery system, or excavation." Please note that a change in remedy for free product recovery may require treatability studies, pilot tests, focused feasibility study, and an ESD or ROD amendment. The Department assumes that EPA will conduct the necessary studies and prepare the necessary documentation should the Department determine that another remedy is required.

Please contact me at (609) 633-1455, or Gwen Zervas at (609) 633-7261 if you have any questions.

Sincerely,



Bruce Venner, Chief
Bureau of Federal Case Management

C: Stephen Cipot, EPA
Gwen Zervas, BFCM